



B. Allen Clardy, Jr., Esquire

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S.C. Certified Mediator

December 14, 2012

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Bowman and Brooke, LLP
1441 Main St., Suite 1000
Columbia, SC 29201

Bard D. Borkon
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150 South Fifth Street, Suite 3000
Minneapolis, MN 55402

Re: Alacia C. Quinton as Personal Representative of the Estate of April Lynn Quinton
v. Toyota Motor Corporation, Toyota Motor Sales USA, Inc., Toyota Motor
Engineering and Manufacturing North America, Inc., Enterprise Leasing
Company – Southeast, LLC
Aiken Division 1:10-cv-02187-MBS
Our File No.: 2010-00017

Counsel:

Please find enclosed Plaintiff's Second Interrogatories and Request for Production to Defendants.

Should you have any questions, please do not hesitate to contact me. Thank you for your attention in this matter.

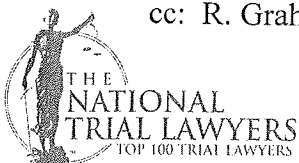
Sincerely,

THE CLARDY LAW FIRM, P.A.

Tilda A. Burgess
Paralegal to B. Allen Clardy, Jr.

/tab

cc: R. Graham Esdale, Jr., Esq.



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INTERROGATORIES AND REQUEST FOR PRODUCTION

1. State the amount of money paid to Geoff Germane, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

2. State the amount of money paid to Robert Gratzinger, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

3. State the amount of money paid to Karen Balavich, her company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

4. State the amount of money paid to Catherine Corrigan, her company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

5. State the amount of money paid to Michael Klima, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

6. State the amount of money paid to William Van Arsdell, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

7. State the amount of money paid to Exponent in each of the last ten (10) years by each of the entities Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc., Toyoda Gosei North America Corporation, and Toyota Motor Engineering & Manufacturing North America, Inc.

8. Produce copies of all interior occupant compartment size specifications for passenger vehicles, SUVs, light trucks and vans manufactured by the Toyota Defendants for the years 2007-2011.

9. Produce any documents, drawings, analyses, emails or any other document by whatever name known which relate to Toyota's decision or reasons for not including a roll over activated curtain shield airbag in the subject vehicle or any passenger car in its line of vehicles.

Respectfully Submitted,

THE CLARDY LAW FIRM

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Attorneys for Plaintiff

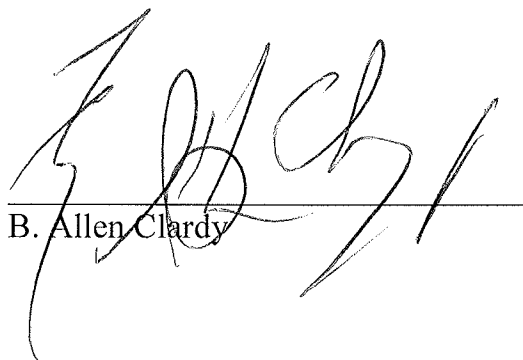
CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have served all counsel in this action with a copy of the foregoing document by mailing a copy of the same by United States Mail, postage prepaid to the following on this the 14th day of December, 2012.

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B. Allen Clardy